IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 15-CR-30146-SPM

ROBIN THOMPSON,

 \mathbf{v} .

Defendant.

MEMORANDUM AND ORDER

McGLYNN, District Judge:

This matter comes before the Court on Defendant Robin Thompson's *pro se* Motion for Sentence Reduction pursuant to 18 U.S.C. § 3582(c) and the United States Sentencing Guidelines Manual § 1B1.10 [hereinafter Sentencing Guidelines], making Amendment 821 retroactive (Docs. 121, 1241).

On February 14, 2024, Assistant Federal Public Defender Daniel G. Cronin was appointed to represent Defendant Thompson pursuant to Administrative Order 362. (See Doc. 123). On February 26, 2024, Attorney Cronin filed a Motion to Withdraw as Attorney because he could "discern no non-frivolous basis for seeking a reduction in Ms. Thompson's term of imprisonment." (See Doc. 124, p. 2). The United States Probation Office completed a worksheet on Defendant Thompson indicating that she does not qualify for a sentence reduction pursuant to Amendment 821. (See

¹ Although styled as two separate motions, as Defendant Thompson's first motion is a letter and the second is a worksheet, the Court construes them together in the aim of liberally construing *pro se* filings. *See Erickson v. Pardus*, 551 U.S. 89, 94 (2007) ("A document filed pro se is 'to be liberally construed,' and 'a pro se complaint, however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers." quoting *Estelle v. Gamble*, 429 U.S. 97, 106 (1976)); *see also Buechel v. United States*, 746 F.3d 753, 758 (7th Cir. 2014).

Doc. 124, pp. 1–2 (citing Sentencing Guidelines § 4C1.1(a)(5))). Although Defendant

Thompson was assessed to have zero criminal history points, her conviction for

Conspiracy to Commit Sex Trafficking of a Child and by Force, Fraud, or Coercion in

violation of 18 U.S.C. § 1594 renders her categorically ineligible for an Amendment

821 sentence reduction. (See id., p. 2).

Accordingly, Defendant Thompson's pro se Motion for Sentence Reduction

pursuant to Amendment 821 (Docs. 121, 126) is **DENIED**. Attorney Cronin's Motion

to Withdraw as Attorney (Doc. 124) is **GRANTED**.

IT IS SO ORDERED.

DATED: April 1, 2024

s/ Stephen P. McGlynn STEPHEN P. McGLYNN U.S. District Judge